



SUPPLIER CODE OF CONDUCT



#LegrandImprovingLives

 **legrand**®



Legrand's purpose is to improve lives. By means of its actions to encourage ever more responsible development, Legrand provides concrete answers to societal and environmental challenges.

We are therefore committed to the decarbonisation of our operations and products, especially by optimising our industrial facilities, deploying eco-design processes, promoting the circular economy and using green energies.

We are also committed to promoting diversity and inclusion in compliance with local regulations and the most advanced societal and ethical standards.

We are convinced that our Corporate Social Responsibility approach and related commitments are key factors in Legrand's performance, growth, and innovation.

The support and contribution of our partners and suppliers are key to achieving our objectives. Our responsible purchasing strategy focuses on fostering and developing collaboration with the partners and suppliers who support us in our approach, in order to build lasting, balanced and mutually beneficial relationships with them. It is within this framework that I am counting on you to join us in this approach and inviting you to sign the Legrand Supplier Code of Conduct, which is entirely in line with the Group's CSR policy.

Sérena SALAME
Group Chief Procurement Officer

Legrand Supplier Code of Conduct

introduction

As a specialist in electrical and digital infrastructures, Legrand provides simple, innovative, and sustainable solutions for buildings all over the world.

The Legrand Group is committed to acting as a responsible player on a daily basis, applying the main international CSR standards. It has been a member of the United Nations Global Compact since 2007 and is thereby committed to promoting the UN Sustainable Development Goals (SDGs). It also complies with the principles of the Universal Declaration of Human Rights and the GAI standards.

This document, hereinafter referred to as the "Supplier Code of Conduct", sets out the standards in terms of human rights, working conditions, respect for the environment and business integrity to which Legrand adheres and to which suppliers and partners must adhere throughout their business relationship with the Group.

*Improving lives
means creating a
more sustainable
world for all*

By signing this Supplier Code of Conduct, suppliers undertake to comply with international standards, applicable legislation and regulations, and more specifically the principles set out in this document. The signatories also agree to promote and enforce these principles among their own suppliers and partners.

Legrand is committed to supporting its suppliers and partners in achieving the high standards it demands. In accordance with our procedures, any failure to comply with or adhere to the fundamental rules and principles set out in the Supplier Code of Conduct may have consequences for the business relationship, up to and including its termination.



Scope

The Supplier Code of Conduct is intended to apply without exception in any contractual and business relationship between any company in the Legrand Group and its suppliers and partners, as well as with respect to any relevant affiliate of the supplier and/or partner. Suppliers are any legal or natural person supplying the Legrand Group with products or services.

Business partners (sometimes referred to herein as "partners") are any legal or natural person, such as subcontractors, which the Legrand Group establishes a business relationship, particularly for the purposes of collaborating in business ventures or projects

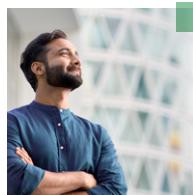


COMPLIANCE WITH LAWS AND REGULATIONS



HUMAN, LABOR AND SOCIAL RIGHTS

- Human rights and working conditions
- Health and security at work
- Diversity and inclusion



ENVIRONMENT

- Reducing environmental impacts
- Managing controlled substances and conflict minerals



INTEGRITY AND BUSINESS ETHICS

- Responsible supplier and partner relationships
- Good business practices
- Data protection



ETHICS ALERT

Ethical alert system, for reporting any conduct or situation that contravenes the present Code of Conduct.

COMPLIANCE WITH LAWS AND REGULATIONS

Suppliers and partners must undertake to respect without restriction, and to ensure that others in their own value chains respect, all laws, regulations and international treaties applicable in the country in which they are established and in the countries in which they conduct business, directly or indirectly, in particular with regard to:

- human, labor, social and fundamental rights;
- respect and protection of the environment;
- business ethics practices, in particular the fight against corruption, respect for competition law, intellectual property law and international trade rules; as well as
- protection of resources, particularly information and data.

When the applicable regulations and this Supplier Code of Conduct cover the same subject matter, the highest standards or most restrictive provisions apply.

We encourage our suppliers and partners to go beyond applicable minimum standards and demonstrate an even greater commitment to social, environmental and business ethics matters.



HUMAN, LABOR AND SOCIAL RIGHTS

Human rights and working conditions

Suppliers and partners must respect fundamental human rights and the dignity of the individual, in accordance with the principles set out in international and national laws, regulations and standards such as:

- the Universal Declaration of Human Rights;
- the ILO (International Labor Organization) Declaration, in particular the 10 conventions relating to fundamental principles and rights at work;
- the Global Compact, in particular the principles relating to Human Rights and labor standards;
- the International Covenant on Civil and Political Rights (ICCPR);
- the International Covenant on Economic, Social and Cultural Rights (ICESCR);
- the United Nations Guiding Principles on Business and Human Rights (or "John Ruggie Report");
- the UN Sustainable Development Goals (SDGs).

Suppliers and partners, when they engage directly or indirectly in outsourcing, have the obligation to comply with current local, national and international regulations regarding employment and professional relations.

In particular, suppliers and partners undertake to respect:

- Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87).
- The Right to Organize and Collective Bargaining Convention, 1949 (No. 98).
- The Forced Labor Convention, 1930 (No. 29) (as well as its 2014 protocol).
- The Abolition of Forced Labor Convention, 1957 (No. 105).
- The Minimum Age Convention, 1973 (No. 138).
- The Worst Forms of Child Labor Convention, 1999 (No. 182).
- The Equal Remuneration Convention, 1951 (No. 100).
- The Discrimination (Employment and Occupation) Convention, 1958 (No. 111).
- The Occupational Safety and Health Convention, 1981 (No. 155).
- The Promotional Framework for Safety and Health at Work Convention, 2006 (No. 187).

In particular, suppliers and partners undertake to:

- respect the minimum legal age indicated by local legislation and, notwithstanding if local laws may permit it, prohibit the employment of children under the age of 15;
- prohibit forced labor, servitude and any other form of work that is not performed voluntarily in exchange for legal compensation and by a person with free will;
- prohibit clandestine or hidden work;
- prohibit all forms of discrimination, particularly based on skin color, gender, sexual orientation, language, political or philosophical beliefs, religion, origins, ethnicities or disability;
- prohibit all forms of mistreatment, inhumane treatment or all forms of harassment (moral, physical or sexual);
- offer decent working conditions, particularly with regard to health and safety rules adapted to the activities carried out;
- respect the legal duration of daily, weekly and rest work;
- Comply with applicable laws relating to wages, including those regarding minimum wage, overtime and legally authorized fringe benefits. If local law does not set a minimum salary, it must be equivalent to the salary offered on the market for an equivalent position; and
- to respect freedom of association.

Suppliers and partners undertake to ensure that those in the value chain respect these rules. They also undertake not to enter into or suspend any business relationship with an actor who contravenes these rules.

HUMAN, LABOR AND SOCIAL RIGHTS - (continued) -

Health and security at work

Suppliers and partners shall implement an effective occupational health and safety (OHS) management system such as ISO 45001. Legrand encourages third-party certification of this system which guarantees continuous improvement in terms of health and safety at work.

Suppliers and partners undertake to respect high standards of health and safety in their activities, to improve the safety of their employees, reduce risks (accidents, occupational illnesses, etc.) in the workplace and create better and safer working conditions.

Suppliers and partners undertake to:

- have a written health and safety policy, preferably signed by management;

- inform and train their employees, particularly those in a managerial position, on their health and safety policy;
- assess workplace risks and implement the necessary actions to alleviate/prevent and/or manage the risks identified via a continuous improvement process;
- apply this approach to third parties in their own value chain;
- regularly assess, particularly through documentary and physical audits, the evolution of the situation and risks within their company(ies) and their value chain in order to update their health and safety policy accordingly; and
- implement an alert and risk reporting procedure.



Diversity and inclusion

Legrand asks its suppliers and partners to contribute to the elimination of all forms of discrimination and to promote equal opportunities by prohibiting within them and within their own value chain any form of discrimination, intimidation and speech which would be based in particular on:

- gender;
- presence of disabilities;
- age;
- origin (social, cultural or ethnic);
- religion;
- political or philosophical beliefs; or
- sexual orientation.

Legrand encourages its suppliers and partners to deploy a Diversity and Inclusion policy and to initiate a third-party certification or labeling process for their company.

Suppliers and partners must ensure that their own alert mechanism allows the collection and processing of reports of discriminatory behavior.

ENVIRONMENT

Reducing environmental impacts

Suppliers and partners have the obligation to comply with local, national and international regulations in force and applicable to their activities in the field of environmental protection.

In particular, on the following subjects,

Water: suppliers and partners must treat wastewater before discharging it into the natural environment or discharging it into authorized treatment plants. Legrand will give preference to suppliers and partners with a policy supporting the reduction of water consumption.

Waste: suppliers and partners must programmatically segregate hazardous waste from non-hazardous waste by specific sorting, store each in suitable and legally compliant containers and conditions, and ensure they are each properly handled/treated in accordance with current local regulations. Legrand prefers suppliers and partners with policies supporting the reduction and recycling the waste.

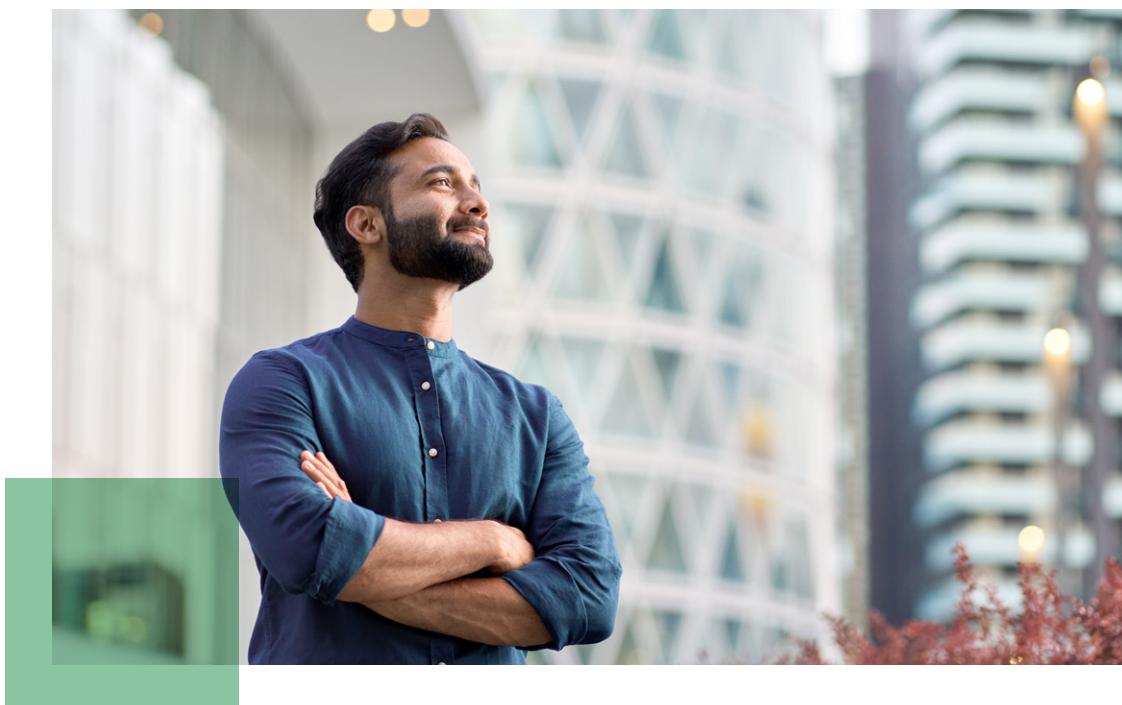
Certification of the environmental management system: Legrand will give preference to suppliers and partners who have had their environmental management system certified (ISO 14001 or equivalent).

Energy consumption and atmospheric emissions:

Legrand will give preference to suppliers and partners with a policy that targets controlling and reducing their energy consumption, emissions of greenhouse gases, noise, dust and volatile chemical emissions. With regard to greenhouse gases, suppliers and partners must measure their carbon footprint, set ambitious CO₂ emissions reduction targets and, ideally, formalize their commitments to the SBTi (Science Based Targets initiative).

Preservation of natural resources: Legrand will give preference to suppliers and partners with a policy of (a) controlling and reducing their use of raw materials in order to preserve natural resources, (b) using materials from recycling sectors and (c) supporting the circular economy. Legrand will give preference to suppliers and partners who commit to a policy of reducing packaging and, in particular, progressive goals toward the elimination of single-use plastic packaging.

Legrand prefers suppliers and partners who take environmental considerations into account in their innovation and manufacturing processes to provide products with as low an environmental impact as possible throughout their life cycle.



ENVIRONMENT

- (continued) -

Managing controlled substances and conflict minerals

Suppliers and partners are required to comply with current local, national and international regulations applicable to their management of hazardous substances and conflict minerals.

With regard to the use of dangerous substances, suppliers undertake in particular to respect, where applicable, the consolidated regulation (EC) 1907/2006 of December 18, 2006 concerning registration, evaluation and authorization of chemical substances, as well as the restrictions applicable to these substances (REACH) and the consolidated directive 2011/65/EU of June 8, 2011 relating to the restriction of the use of certain dangerous substances in electrical and electronic equipment (RoHS), including measurements/metrics included in such legislation.

In addition, Legrand asks its suppliers and partners, regardless of the manufacturing and marketing locations, to communicate for the products, components, substances, materials supplied:

- the presence of any dangerous substances;
- the proportion of these substances;
- the name of the regulation(s) associated with these substances;
- the specific measures to be adopted for use and end-of-life management;
- if applicable, documents attesting that the appropriate conformity assessment procedure has been applied and,
- If applicable, the safety data sheets established in accordance with Annex II of Regulation 1907/2006 or equivalent.

This information will be updated proactively by the suppliers and partners as soon as a revision of the regulations (or a modification to its annexes) comes into force.

With regard to minerals from conflict zones, suppliers, partners and subcontractors undertake, in particular, to comply with the OECD guide on due diligence for responsible supply chains for minerals from conflict or high-risk areas, including all of its annexes and supplements and, if applicable, to the consolidated Regulation (EU) 2017/821 of May 17, 2017 as well as the applicable requirements of Section 1502 of the Dodd-Frank Act, establishing obligations linked to the duty of care with regard to the supply chain for importers of tin, tantalum and tungsten and gold, also known as "3TG", potentially coming from conflict or high-risk areas.

Suppliers, partners and subcontractors undertake more specifically:

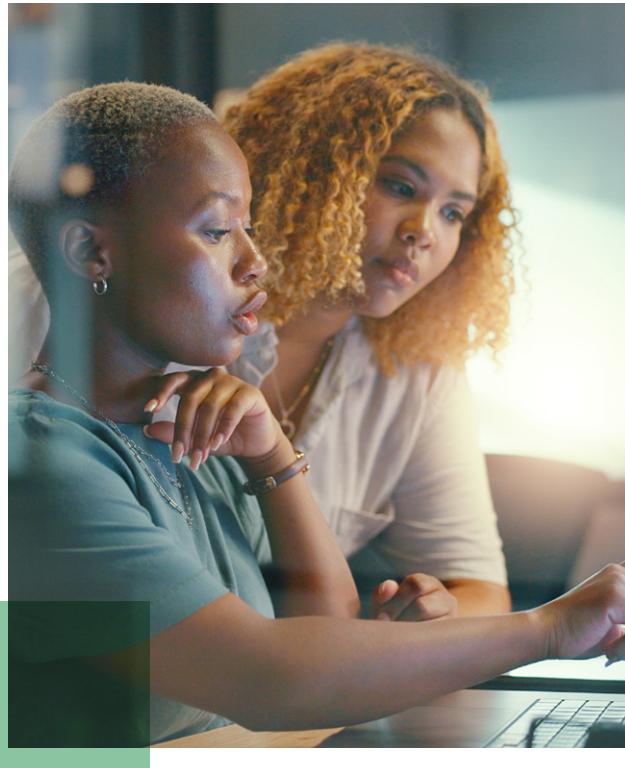
- not to source (directly or through subcontractors) minerals from conflict or high-risk areas;
- to comply with their supply chain due diligence obligations and maintain documentation demonstrating compliance with their obligations, including the results of verifications carried out by independent third parties;
- to put in place controls to monitor the origin of the minerals purchased and to communicate them to Legrand; and,
- to respect the Group's Conflict Minerals policy.

Legrand expects its suppliers and partners to communicate proactively their policy on conflict minerals or at least the duly completed and up to date CFSI CMRT (Conflict Minerals Reporting) Template and EMRT (Extended Mineral Reporting) Template upon request.

INTEGRITY AND BUSINESS ETHICS

Responsible supplier and partner relationships

Legrand is committed to building and maintaining lasting relationships with its suppliers and partners, based on trust and mutual respect, as well as good business practices.



Good business practices

All commercial transactions must be carried out in a transparent manner while respecting at least the following rules (**“Rules of Good Practice”**) :

- act with fairness, transparency and impartiality;
- respect the confidentiality of all information exchanged;
- commitments must be made in writing;
- fight against active and passive corruption and influence peddling, by putting in place measures to prevent and manage corruption risks, such as a code of conduct and Know Your Partners procedures, including measures design to detect and prevent private bribery, such as invitations or gifts made with the intent of obtaining compensation or business relationships and/or otherwise likely to compromise the commercial relationship;
- fight against extortion;
- fight against stock market offenses such as insider trading, price manipulation and publication of false or misleading information;
- fight against conflicts of interest by putting in place systems to prevent and manage conflicts of interest;
- fight against fraud, particularly tax and social fraud;
- fight against money laundering and terrorist financing, by implementing Know Your Customer (KYC) procedures;
- respect embargoes and international sanctions;
- respect free competition;
- respect intellectual property rights;

- Respect the right to privacy and European regulations on data protection (in particular the GDPR);
- Comply with legal and regulatory provisions regarding IT security, as well as relevant internal Legrand instructions, in all cases where the provision of service involves access to the information systems of Legrand establishments.

Suppliers and partners undertake to comply with the laws, directives and regulations in force in the countries where they carry out their activities, as well as in the countries where they are established, and in particular with regard to the provisions governing these Rules of Good Practice.

Suppliers and partners undertake to ensure compliance with these Rules of Good Practice by all players in their own value chain. Suppliers and partners undertake not to have business relations with any actor who refuses to respect the Rules of Good Practice.

Data protection

Suppliers and partners undertake to,

- respect the right to privacy and European data protection regulations (GDPR - General Data Protection Regulation);
- respect good practices and market standards in terms of cybersecurity, including the implementation of appropriate technical and organizational measures

(aligned with good practices and market standards such as ISO 27001/2, NIST CSF or equivalent), rapid notification of security incidents and cooperation during audits and penetration tests. In addition, service providers must guarantee continuity of service and take care of any security failures identified during audits or tests.

ETHICS ALERT

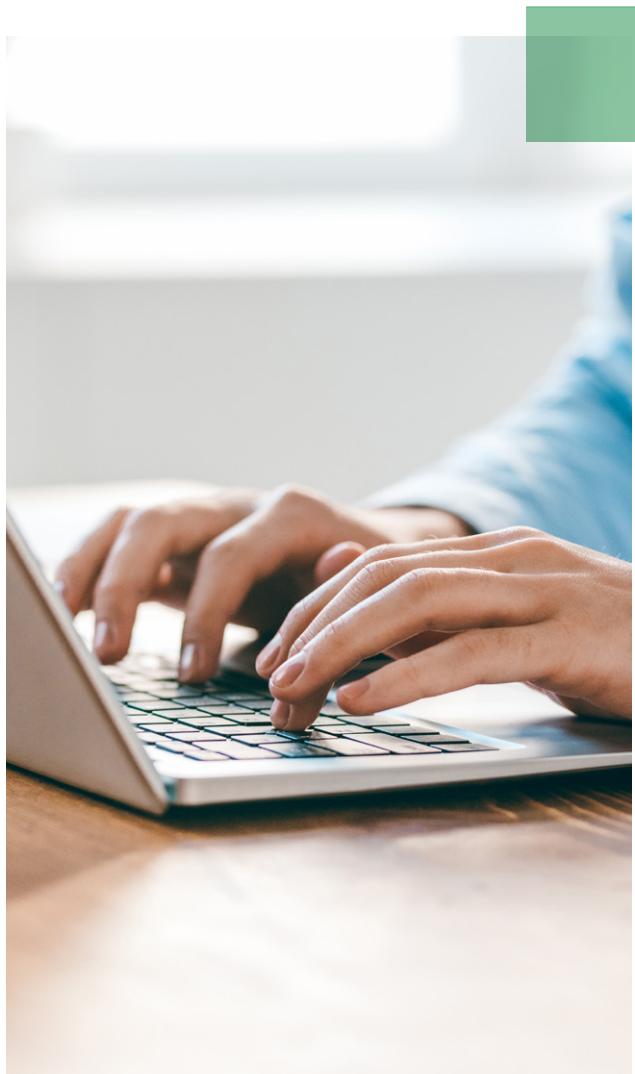
Legrand has set up Signal'Ethic, accessible at the following address: <https://legrand.signalement.net>

This ethics alert system allows all employees and stakeholders of the Legrand Group to report any conduct or situations contrary to the Supplier Code of Conduct, as well as any other illegal, unethical and/or dangerous fact or behavior affecting the interest general, to people or to the company.

In accordance with French and European regulations relating to the protection of whistleblowers and the [Group policy relating to the ethics alert system](#), any alert made via the above-mentioned address will be processed in such a way as to guarantee the rights of whistleblowers, notably:

- confidentiality regarding the identity of the whistleblower and the people involved in the report;
- the integrity and confidentiality of the facts subject to the report; and
- prompt processing of the report, at the latest within three months from acknowledgment of receipt of the report.
- The prohibition of retaliation against the whistleblower, the facilitators and people linked to the whistleblower.

By signing this Supplier Code of Conduct, suppliers and partners undertake to inform their employees who engage with Legrand of its existence.



COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT AND AUDIT

Signing this Supplier Code of Conduct is a prerequisite for any commercial relationship that the Legrand Group may initiate with a supplier or partner.

In general, the Legrand Group expects its suppliers and partners to respect international standards, current legislation and regulations, and more specifically the principles set out in this Supplier Code of Conduct.

By signing and returning a signed copy of the Supplier Code of Conduct, the supplier or partner:

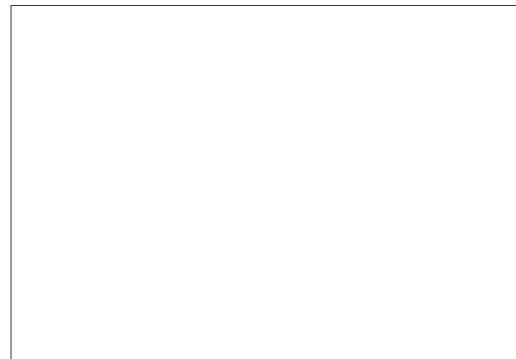
- agrees to having read all the principles set out in the Supplier Code of Conduct;
- undertakes to put in place the necessary means to comply with the above-mentioned requirements and also undertakes to pass through such requirements to all of its own suppliers and partners;
- agrees to respond to Legrand's request for completion of self-assessment questionnaires, and Legrand's right to audits supplier to confirm compliance;
- agrees to grant Legrand or its auditor(s) access to supplier's premises for auditors, internal or external, mandated by Legrand and undertakes to facilitate Legrand's access to the premises of supplier's own suppliers and partners in order to verify compliance herewith; and
- agrees that the Legrand may request corrective actions when deviations are noted in ethical, environmental and societal practices to meet the level of requirements described in this Supplier Code of Conduct, and that supplier will take such corrective actions.

This approach is part of a collaborative dynamic and continuous improvement, and Legrand is committed to supporting you in achieving these objectives.

SUPPLIER OR PARTNER COMMITMENT

Name of the company (the "Company"):

*Stamp and signature preceded by the words
"read and approved on behalf of and in the
name of the Company":*



Company address:

Name and position of signatory:
